

# **EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL No. 2327</b>
<b>THIS DOCUMENT RELATES TO:</b>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>
<i>Lauri Bell, et al. v. Ethicon, Inc., et al.</i> <i>Case No. 2:13-cv-05389</i>	

**PLAINTIFF'S DESIGNATION AND  
DISCLOSURE OF GENERAL AND CASE-SPECIFIC EXPERT WITNESSES**

Pursuant to Rule 26 (a)(2) of the Federal Rules of Civil Procedure, Plaintiff in the above-captioned civil action ("Plaintiff") submits the following Designation and Disclosure of General and Case-Specific Expert Witnesses and persons who may provide expert testimony specific to Plaintiff's case pursuant to Rule 702 of the Federal Rules of Evidence.

**CASE SPECIFIC AND GENERAL  
EXPERT WITNESSES**

1. Bruce Rosenzweig, M.D. (Urogynecologist)  
175 East Delaware, Suite 8909  
Chicago, IL 60611

Plaintiff refers Defendants to Dr. Rosenzweig's case specific (attached) and general Expert Reports (on file in this MDL) for Prolift+M and/or TVT-O and all subparts and attachments thereto which set forth his opinions and the reasons and bases for them in this case. The general reports have already been served in this MDL. Dr. Rosenzweig's Expert Reports and corresponding attachments set forth the facts, data and information considered by Dr. Rosenzweig, the exhibits that Dr. Rosenzweig may use to support his opinions, and Dr. Rosenzweig's qualifications, publications, testimonial history, and compensation. Plaintiff hereby incorporates by reference Dr. Rosenzweig's Expert Reports and all subparts and attachments thereto as if fully set forth herein.

2. Dr. Daniel Elliott (Urologist)  
Mayo Clinic  
175<sup>st</sup> Street SW  
Rochester, MN 55902

Plaintiff refers Defendants to Dr. Daniel Elliott's Expert Reports, and all subparts and attachments thereto which sets forth his opinions and the reasons and bases for them as to Plaintiff's medical devices at issue. These reports have already been served in this MDL. Dr. Elliott's Expert Reports and corresponding attachments set forth the facts, data and information considered by Dr. Elliott, the exhibits that Dr. Elliott may use to support his opinions, and Dr. Elliott's qualifications, publications, testimonial history, and compensation. Plaintiff hereby incorporates by reference Dr. Elliott's Expert Reports and all subparts and attachments thereto.

3. Dr. Brian Raybon (Urogynecologist)  
79 Doyle St  
Tacoa, GA 30577

Plaintiff refers Defendants to Dr. Brian Raybon's Expert Reports, and all subparts and attachments thereto which sets forth his opinions and the reasons and bases for them as to Plaintiff's medical devices at issue. These reports have already been served in this MDL. Dr. Raybon's Expert Reports and corresponding attachments set forth the facts, data and information considered by Dr. Raybon, the exhibits that Dr. Raybon may use to support his opinions, and Dr. Raybon's qualifications, publications, testimonial history, and compensation. Plaintiff hereby incorporates by reference Dr. Raybon's Expert Reports and all subparts and attachments thereto.

4. Dr. Scott Guelcher (Materials)  
Polymer and Chemical Technologies, LLC  
1008 Caldwell Avenue  
Nashville, TN 37204

Plaintiff refers Defendants to Dr. Guelcher's Expert Reports, and all subparts and attachments thereto which sets forth his opinions and the reasons and bases for them as to Plaintiff's medical devices at issue and/or the material used in each. These reports have already been served in this MDL. Dr. Guelcher's Expert Reports and corresponding

attachments set forth the facts, data and information considered by Dr. Guelcher, the exhibits that Dr. Guelcher may use to support his opinions, and Dr. Guelcher's qualifications, publications, testimonial history, and compensation. Plaintiff hereby incorporates by reference Dr. Guelcher's Expert Reports and all subparts and attachments thereto.

**GENERAL RETAINED REGULATORY EXPERTS**

Plaintiffs recognize that the Fourth Circuit has affirmed Judge Goodwin's decision to exclude evidence relating to a manufacturer's compliance with the FDA's 510(k) process. In the event of a contrary ruling, Plaintiffs reserve the right to designate the following General Regulatory Experts:

5. Dr. Peggy Pence (Regulatory)  
Symbion Research International, Inc.  
3537 Old Conejo Road, Suite 115  
Newbury Park, CA 91320

A General Designation and Disclosure has been or is being served by and on behalf of the Wave 10 cases for general expert opinions. In the event that any of the general expert(s) identified above is/are unavailable for trial in this case, Plaintiff reserves the right to elicit testimony, either through direct examination or cross-examination, of any other of the general witnesses designated or identified by Plaintiffs in this wave or prior for both the Prolift+M and TVT-O devices. In no event, however, will Plaintiff's retained experts at trial exceed five (5) experts without leave of Court for good cause shown. Plaintiff further reserves the right, as allowed by Rule 26(e) of the Federal Rules of Civil Procedure, to supplement this Designation and Disclosure of Expert Witnesses through the discovery process upon receiving additional discovery including, but not limited to, expert depositions, fact depositions, exhibits introduced in depositions, documents produced, and any supplemental expert disclosures by any party.

**NON-RETAINED EXPERT WITNESSES**

<b>NAME</b>	<b>ADDRESS</b>	<b>SPECIALITY</b>
Dr. Shlomo Raz	MP2 Perioperative Plaza 757 Westwood Plaza Los Angeles, CA 9095-8358	Urology
Dr. Jacquelin Hart	6301 Richmond Ave Houston, TX 77057	Oncology
Dr. Patricia Salvato	6301 Richmond Ave Houston, TX 77057	Internal Medicine
Dr. Steven Spencer	701 Fry Road Katy, TX 77450	Family Practice
Dr. Rebecca Luthcke	920 Frostwood Dr, #560 Houston, TX 77024	Obstetrics and Gynecology
Thomas Debauche, MD	21212 NW Fwy, #405 Cypress, TX 77429	Cardiovascular Diseases
Dr. Craig Gordon	21316 Provincial Blvd Katy, TX 77450	Gastroenterology
Dr. Elizabeth Boehme	3400 Bissonnet St, #100 Houston, TX 77005	Internal Medicine
Dr. Christina Pramudji	915 Gessner Rd. #720 Houston, TX 77024	Urology
Kelliwood Family Practice	701 Fry Road, #103 Katy, TX 77450	
Methodist Willowbrook Hospital	18220 State Hwy 249 Houston, Tx 77070	
Memorial Hermann Medical Group Urology	915 Gessner Road, #720 Houston, TX 77024	
Methodist Hospital OBGYN	6560 Fannin St, #2100 Houston, TX 77030	

The foregoing non-retained designations include, but are not limited to any agents, employees, representatives, pathologists, nurses, technicians, aides, record custodians, and practice facilities of each provider identified. Further, it is Plaintiffs' intent to designate all

healthcare providers who treated Plaintiff for any relevant injuries and damages asserted in this case including, but not limited to, any providers identified in Plaintiffs' medical records which may have been inadvertently excluded from the list above and those to whom Plaintiff is referred for treatment following this designation, if applicable.

This 22<sup>nd</sup> day of February, 2019.

By: /s/ **Erin K. Copeland**

Erin K. Copeland

Federal ID#29219

State Bar # 24028157



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